

4. Mr. Shabazz has advised his counsel that he has documents in his possession in his prison cell that would support a claim against CCSP, including the existence of policies or procedures to support his deliberate indifference claim against CCSP. Given his diminished vision and logistical difficulties, Mr. Shabazz has not been able or willing to provide those documents to his counsel, despite repeated requests.

5. While somewhat unusual, Mr. Shabazz's counsel requests that the Court order Mr. Shabazz to provide the described documents in his possession to his counsel for review and copying. After copying, Counsel will return the originals to Mr. Shabazz. Counsel asks that Mr. Shabazz be ordered to provide those documents to his counsel no later than January 5, 2018, and that the date for filing any further amended complaint be extended to January 15, 2018.

6. Plaintiff's counsel contacted counsel for Defendant CCSP on December 12, 2017, requesting an extension to file a Third Amended Complaint until it could review the documents in Plaintiff's possession, but CCSP declined this request and stated its intention to "oppos[e] any such motion" for an extension. *See* Exhibit A. Again on December 13, 2017, in accordance with Local Rule 7.1.1, Plaintiff's Delaware counsel reached out to Defendant CCSP, but Defendant CCSP again denied any request for an extension to file a Third Amended Complaint.

WHEREFORE, it is respectfully requested that this Court enter an order requiring Mr. Shabazz to turn over to his counsel all documents in his possession supporting his claims against CCSP by January 5, 2018, and extending Mr. Shabazz's deadline to file a Third Amended Complaint until January 15, 2018.

Respectfully submitted,

Dated: December 13, 2017

/s/ Joanna J. Cline

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CERTIFICATE OF SERVICE

I, Christopher B. Chuff, hereby certify that on this 13th day of December, 2017, I electronically filed the foregoing PLAINTIFF'S EMERGENCY MOTION FOR AN EXTENSION TO FILE A THIRD AMENDED COMPLAINT, which shall send notification of such filing to counsel of record for all parties.

Respectfully submitted,

Dated: December 13, 2017

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